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## **EXHIBIT 5.1**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

THE TRUSTEES OF  
PURDUE UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS  
INTERNATIONAL N.V., and  
STMICROELECTRONICS, INC.,

Defendants.

Civil Action No. 6:21-cv-00727-ADA

JURY TRIAL DEMANDED

**[PLAINTIFF'S PROPOSED] JURY VERDICT FORM**

When answering the following questions and filling out this Verdict Form, please follow the directions provided throughout the form. Your answer to each question must be unanimous. Some of the questions contain legal terms that are defined and explained in detail in the Jury Instructions. Please refer to the Jury Instructions if you are unsure about the meaning or usage of any legal term that appears in the questions below.

In this Verdict Form, the following terms have the following meanings:

- “**Purdue**” refers to The Trustees of Purdue University, the Plaintiff in this case.
- “**ST**” refers collectively to ST Microelectronics International N.V. and

STMicroelectronics, Inc.

- The “**Patent-in-Suit**” refers to U.S. Patent No. 7,498,633.
- The “**Asserted Claims**” refers collectively to Claims 9 and 10 of the Patent-in-Suit.

**IT IS VERY IMPORTANT THAT YOU FOLLOW THE INSTRUCTIONS  
PROVIDED IN THIS VERDICT FORM**

**READ THEM CAREFULLY AND ENSURE THAT YOUR VERDICT  
COMPLIES WITH THEM**

We, the jury, unanimously agree to the answers to the following questions and return them as our verdict in this case:

**INFRINGEMENT**

**Directions:** In answering Question 1 below, please answer either “Yes” or “No” for each listed claim.

**QUESTION 1:** Has **Purdue** proven by a preponderance of the evidence that **ST** directly infringed the following claims of the **Patent-in-Suit**?

“Yes” is a finding for **Purdue**. “No” is a finding for **ST**.

**Claim 9:** Yes\_\_\_\_\_ No\_\_\_\_\_

**Claim 10:** Yes\_\_\_\_\_ No\_\_\_\_\_

**Directions:** In answering Question 2 below, please answer either “Yes” or “No” for each listed claim.

**QUESTION 2:** Has **Purdue** proven by a preponderance of the evidence that **ST** indirectly infringed the following claims of the **Patent-in-Suit**?

“Yes” is a finding for **Purdue**. “No” is a finding for **ST**.

**Claim 9:** Yes  No

**Claim 10:** Yes  No

## **VALIDITY**

**Directions:** In answering Question 3 below, please answer either “Yes” or “No” for each listed claim.

**QUESTION 3:** Has **ST** proven by clear and convincing evidence that the following claims of the **Patent-in-Suit** are invalid?

“Yes” is a finding for **ST**. “No” is a finding for **Purdue**.

**Claim 9:**            Yes \_\_\_\_\_      No \_\_\_\_\_

**Claim 10:**          Yes \_\_\_\_\_      No \_\_\_\_\_

Before proceeding to the next page, please review questions 1–3 above to ensure that all questions have been answered unanimously.

## **DAMAGES**

**Directions:** Only answer Question 4 if you found one or more patent claims were infringed and not invalid by having answered: (1) “Yes” to at least one claim of one patent in response to Question 1 or Question 2; and (2) “No” for those same claims in response to Question 3.

**QUESTION 4:** What sum of money, if paid now in cash, has **Purdue** proven by a preponderance of the evidence would fairly and reasonably compensate **Purdue** for ST’s infringement of the **Asserted Claims** of the **Patent-in-Suit**? Answer in United States dollars and cents.

\$ \_\_\_\_\_.

**QUESTION 5:** What percentage of ST’s sales has **Purdue** proven by a preponderance of the evidence would fairly and reasonably compensate **Purdue** for ST’s infringement of the **Asserted Claims** of the **Patent-in-Suit** going forward.

\_\_\_\_\_ %

**WILLFULNESS**

**Directions:** Only answer Question 6 if you found one or more patent claims were infringed and not invalid by having answered: (1) “Yes” to at least one claim of one patent in response to Question 1 or Question 2; and (2) “No” for those same claims in response to Question 3.

**QUESTION 6:** Has **Purdue** proven by a preponderance of the evidence that **ST** willfully infringed the following claims of the **Patent-in-Suit**?

“Yes” is a finding for **Purdue**. “No” is a finding for **ST**.

**Claim 9:** Yes        No       

**Claim 10:** Yes        No       

Please proceed to the **FINAL PAGE**.

**FINAL PAGE OF THE JURY VERDICT FORM**

You have now reached the end of the Verdict Form and should review it to ensure it accurately reflects your **unanimous** determinations. The Jury Foreperson should then sign and date the Verdict Form in the spaces below. Once this is done, notify the Court Security Officer that you have reached a verdict. The Jury Foreperson should keep the Verdict Form and bring it when the jury is brought back into the courtroom.

Signed this \_\_\_\_\_ day of October, 2023.

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Jury Foreperson